



APPLICATION GRANTED
SO ORDERED *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J.

Date: December 26, 2024

MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

December 23, 2024

VIA ECF

Hon. Vernon S. Broderick
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *J.M. v. New York City Public Schools*, 24-cv-5083 (VSB)(BCM)

Dear Judge Broderick:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day stay of this action until March 21, 2025. Plaintiff consents to this request, and provided the needed billing records on Dec. 20, 2024, and retainer agreement today. (Defendant's deadline to respond to the Complaint is currently February 12, 2025). On October 21, 2024, the Court granted Defendant's first request for an extension. (ECF 11). We note that, while this is an IDEA fees-only case and liability appears not at issue, without the relevant billing, Defendant was not able to begin its internal settlement review process. Now that Plaintiff provided the needed billing records, Defendant will proceed with this review, which includes review of the underlying administrative record together with the relevant billing records and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice, conferences or even the need to file an Answer. The parties are hopeful this matter will be resolved as well.

I also respectfully propose that, if a stay is granted, the parties be required to submit a joint status letter regarding settlement negotiations on or before March 21, 2025.

Thank you for considering these requests.

Respectfully submitted,
/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)